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February 4, 2019

**BY ECF**

The Honorable Carol Bagley Amon  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.*,  
No. 1:19-cv-00007 (E.D.N.Y. filed Jan. 1, 2019)**

Dear Judge Amon:

We represent Defendants Byblos Bank S.A.L., Bank of Beirut and the Arab Countries S.A.L. and Lebanon & Gulf Bank S.A.L. in the above-referenced action. We write on behalf of all parties (copied below) pursuant to Your Honor's Individual Motion Practices and Rules 2.A and 2.D. Counsel for Plaintiffs and Defendants respectfully request that the Court grant all Defendants an interim extension of time, until February 14, 2019, to negotiate with Plaintiffs a stipulation and proposed order, for the Court's consideration, addressing service of process and the time within which Defendants shall respond to the Complaint.<sup>1</sup> This is the parties' first request for an extension of any kind in this matter.

Defendants are eleven separate foreign financial institutions; they recently learned of this lawsuit and retained U.S. counsel. Counsel for all parties are now engaged in communications in an effort to finalize a joint stipulation that seeks to amicably resolve scheduling and service issues. However, Counsel require several more days to finalize the terms of this stipulation and to obtain the consent of their clients.

All parties expressly reserve all of their respective rights, defenses, privileges, and immunities.

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<sup>1</sup> The current docketed response dates, based on the assumption that service via international mail to recipients in Lebanon was proper and sufficient, are as follows: February 4, 2019 (Société Générale de Banque au Liban S.A.L. (ECF No. 32); Fransabank S.A.L. (ECF No. 33); Bank of Beirut and the Arab Countries S.A.L. (ECF No. 34); Bank of Beirut S.A.L. (ECF No. 35); Middle East and Africa Bank S.A.L. (ECF No. 36); Lebanon & Gulf Bank S.A.L. (ECF No. 37); Byblos Bank S.A.L. (ECF No. 38); Bank Audi S.A.L. (ECF No. 39); Banque Libano-Française S.A.L. (ECF No. 40); Jammal Trust Bank S.A.L. (ECF No. 41)); and February 7, 2019 (BLOM Bank S.A.L. (ECF No. 42)).



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We thank the Court, in advance, for its consideration of this joint request.

Respectfully submitted,

/s/  
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